1	BUCHALTER NEMER		
2	A Professional Corporation DENISE H. FIELD (SBN: 111532) RANDALL L. MANVITZ (SBN: 22459	(8)	
3	55 Second Street, Suite 1700 San Francisco, CA 94105-3493	9)	
4	Telephone: (415) 227-0900 Facsimile: (415) 227-0770		
5	Email: dfield@buchalter.com Email: rmanvitz@buchalter.com		
6 7	Attorneys for Plaintiff and Counter-Claim De MARBLE BRIDGE FUNDING GROUP, IN		
8	UNITED STAT	ES DISTRICT COURT	
9	NORTHERN DISTRICT OF CALIFORNIA		
10			
11	SAN JO	OSE DIVISION	
12	MARBLE BRIDGE FUNDING GROUP, INC.,	Case Nos.: 5:12-CV-01839-EJD; 5:12-CV-02729-EJD	
13	•		
14	Plaintiff, vs.	STIPULATION AND [XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	
15		WIN WIGHT OF THE TOP	
16	NATURE'S OWN PHARMACY, LLC, et al.,		
17			
18	Defendants.		
19	MARBLE BRIDGE FUNDING GROUP, INC.,		
20	Plaintiff,		
21	vs.		
22 23	EULER HERMES AMERICAN CREDIT INDEMNITY COMPANY,		
24	Defendant.		
25	EULER HERMES AMERICAN CREDIT		
26	INDEMNITY COMPANY,		
27	Counterclaim Plaintiff,		
28	BN 13902513v1		
	STIPULATION AND [PROPO	SED] ORDER RE CONTINUING CMC	

Case 5:12-cv-02729-EJD Document 71 Filed 04/30/13 Page 2 of 5

1 VS. 2 NATURE'S OWN PHARMACY, LLC, RICHARD WALLACE; RICHARD 3 WALLACE, et al., 4 Counterclaim Defendants. 5 Plaintiff and Counter-Claim Defendant Marble Bridge Funding Group ("Marble Bridge") 6 and Defendant and Counter-Claim Plaintiff Euler Hermes American Credit Indemnity Company 7 (now known as Euler Hermes North America Insurance Company) ("Euler Hermes"), by and 8 9 through their respective counsel, hereby stipulate and agree, and request the Court to so order, to reschedule the Case Management Conference set for May 3, 2013 to June 28, 2013. This is the 10 first request to extend the CMC and the parties believe it will have no overall effect on the 11 administration of this case. 12 Good cause exists to reschedule the CMC. On April 5, 2013, Marble Bridge consented to 13 the substitution of Buchalter Nemer as its counsel. Marble Bridge seeks the continuance to 14 provide its counsel with a reasonable opportunity to review the files in this action and prepare for 15 the CMC. 16 Further, counsel for Marble Bridge and Euler Hermes would like additional time to confer 17 regarding discovery and a joint case management conference statement. The remaining parties 18 19 are not expected to appear because of pending criminal charges. 20 21 22 23 24 25 26 27 28 - 2 -BN 13902513v1

Case 5:12-cv-02729-EJD Document 71 Filed 04/30/13 Page 3 of 5 1 Dated: April 29, 2013 **BUCHALTER NEMER** 2 By: /s/ Randall L. Manvitz 3 Randall L. Manvitz Attorney for Plaintiff and Counter-Claim 4 Defendant MARBLE BRIDGE FUNDING 5 **GROUP** 6 Dated: April 29, 2013 HALPERIN BATTAGLIA RAICHT, LLP 7 8 By: /s/ Neal W. Cohen Neal W. Cohen 9 Attorney for Defendant and Counter-Claim Plaintiff EULER HERMES AMERICAN 10 CREDIT INDEMNITY COMPANY now known as EULER HERMES NORTH 11 AMERICA INSURANCE COMPANY 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 BN 13902513v1 - 3 -STIPULATION AND [PROPOSED] ORDER RE CONTINUING CMC

Case 5:12-cv-02729-EJD Document 71 Filed 04/30/13 Page 4 of 5

1	ORDER
2	PURSUANT TO THE PARTIES' STIPULATION, IT IS ORDERED AS FOLLOWS:
3	The Case Management Conference is rescheduled from May 3, 2013 to June 28, 2013. The parties shall file an updated joint case management conference statement on or
5	before June 21, 2013 IT IS SO ORDERED.
6	Dated: April 30, 2013
7	Honorable Edward J. Davila
8	Judge of the Northern District Court
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
2526	
27	
28	
20	BN 13902513v1 - 4 -
	STIPULATION AND [PROPOSED] ORDER RE CONTINUING CMC

1	CERTIFICATE OF SERVICE
2	I, Randall L. Manvitz, hereby certify that on this 29 th day of April 2013, a true and correct
3	copy of the foregoing document was filed electronically. Notice of this filing will be sent by
4	electronic mail to all counsel of record by operation of the Court's electronic filing system.
5	Parties may access this filing through the Court's system. A paper copy was sent, via U.S. Mail,
6	to the following individuals:
7	Richard Wallace 712 93 rd Avenue North St. Petersburg, FL 33702
9	0084362 Marsha Holloway c/o Marion County Jail 700 NW 30 th Avenue
11	Ocala, FL 34475
12	By: /s/ Randall L. Manvitz
13	By. 75/ Randan D. Wanvitz
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	BN 13902513v1 - 5 -